

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

BERKSHIRE GAS COMPANY

D.T.E. 01-56

ATTORNEY GENERAL'S ELEVENTH SET OF
DOCUMENT AND INFORMATION REQUESTS

The following is the Attorney General's ELEVENTH SET of information requests in the above referenced docket to be answered according to the instructions already issued by the Attorney General.

- AG-11-1 Please provide a copy of the attachment to the Company's response to Information Request AG-1-66 showing the history of the medical reserve balance.
- AG-11-2 Referring to the Company's response to Information Request AG-1-34, Account 146 1461 – Interco A/R Due from BER, please provide all of the payment terms associated with the accounts receivable from BER. Please also provide a three-year history of the billing dates and payment dates associated with these accounts receivable.
- AG-11-3 Referring to the Company's response to Information Request AG-1-34, Account 146 1462 – Interco A/R Due from Propane, please provide all of the payment terms associated with the accounts receivable from Propane. Please also provide a three-year history of the billing dates and payment dates associated with these accounts receivable.
- AG-11-4 Referring to the Company's response to Information Request AG-1-34, Account 146 1463 – Interco A/R Due from BEM, please provide all of the payment terms associated with the accounts receivable from BEM. Please also provide a three-year history of the billing dates and payment dates associated with these accounts receivable.
- AG-11-5 Referring to the Company's response to Information Request AG-1-34, Account 146 1464 – Interco A/R Due from BSS, please provide all of the payment terms associated with the accounts receivable from BSS. Please also provide a three-year history of the billing dates and payment dates associated with these accounts receivable.

- AG-11-6 Referring to the Company's response to Information Request AG-1-34, Account 403 5770 – Depreciation, please provide a complete and detailed description of the reasons for the \$250,000 decrease in depreciation expense during the year 2000, given the apparent increase in depreciable plant during that year.
- AG-11-7 Referring to the Company's response to Information Request AG-1-34, Account 690 4501 – Revenues, please itemize and quantify the revenues included in this account.
- AG-11-8 Referring to the Company's "Customer Incentive Program," please provide all promotional materials related to that program. Please also provide a company policy regarding customer eligibility as well as the Company marketing strategy regarding contacting those potential customers.
- AG-11-9 Referring to the Company's response to Information Request AG-1-34, Account 925 5605 – Workers Compensation, please provide a complete and detailed description of the reasons for the 100 percent increase in that expense during the test year in this case.
- AG-11-10 Referring to the Company's response to Information Request AG-1-34, Account 925 5602 – Liability Insurance, please provide a complete and detailed description of the reasons for the 53 percent increase in that expense during the test year in this case.
- AG-11-11 Please provide the following information for the accounts with CHARGE Code 5133 – Gas Used By Company:
- (1) the sum of the test year expenses of all the accounts;
 - (2) copies of the bills for the test year;
 - (3) the basis for the rates in the tariffs / charges included in the bills for the test year; and
 - (4) a complete and detailed description of the difference(s), if any, between those volumes charges under Code 5133 and the amount indicated as "Company Use" in the Company's GAF calculations.
- AG-11-12 Referring to the Company's response to Information Request AG-1-72, please provide a complete and detailed description of the 93 percent increase in the test year amount of gross-write-offs.
- AG-11-13 Referring to the Company's response to Information Request AG-1-74, please provide the test year journal entries for the accounting of the receivables transactions with the collection agency. Please also itemize and quantify the test year costs to the Company of the collection agency.

AG-11-14 Referring to the Company's response to Information Request AG-1-83, please provide the amount paid as well as the amount expensed during the test year in this case.

AG-11-15 Referring to the Company's response to Information Request AG-1-87, please provide the amounts expensed during the test year in this case.

Dated: September 25, 2001